

INSTRUCTION NO. \_\_\_\_

In order to establish that the failure to act of the defendant Sheriff Gary Toelke or Franklin County, Missouri, deprived the plaintiff of her particular rights under the United States Constitution as explained in later instructions, the plaintiff must prove by a preponderance of the evidence that the failure to act was so closely related to the deprivation of the plaintiff's rights as to be the moving force that caused the ultimate injury.

Ninth Circuit Model Civil Jury Instructions, 9.8  
Causation  
Submitted by Plaintiff